

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING
LITIGATION**

**THIS DOCUMENT RELATES TO:
SELF-FUNDED PAYER TRACK**

**Case 2:23-md-03080
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI
JUDGE RUKHSANAH L. SINGH**

NOTICE OF MOTION FOR LEAVE TO AMEND COMPLAINTS

PLEASE TAKE NOTICE that Plaintiffs, by and through Co-Lead Counsel for the Self-Funded Payer Track (“Plaintiffs”), will move before the Honorable Rukhsanah L. Singh, U.S.M.J., at a date and time to be determined by the Court, at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order, pursuant to Federal Rules of Civil Procedure 15 and 16, granting Plaintiffs leave to amend their complaints.

PLEASE TAKE FURTHER NOTICE that the specific Plaintiffs to which this Motion applies are identified in Schedule A attached hereto.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, Plaintiffs will rely upon the Brief and the Declaration of David R. Buchanan

submitted herewith, along with any further submissions on reply and any arguments of counsel.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby request oral argument.

Respectfully submitted,

Dated: January 31, 2025

s/ David R. Buchanan
David R. Buchanan
SEEGER WEISS LLP

Benjamin J. Widlanski
**KOZYAK TROPIN &
THROCKMORTON, LLP**

Brandon L. Bogle
**LEVIN, PAPANTONIO, PROCTOR,
BUCHANAN, O'BRIEN, BARRY,
MOUGEY, P.A.**

Mark P. Pifko
BARON & BUDD, P.C.

*Co-Lead Counsel for Self-Funded
Payer Track*

SCHEDULE A

Case Name	Case No.
County of Monmouth, New Jersey v. Eli Lilly and Company, et al.	2:23-cv-03916
Cattaraugus County, New York v. Eli Lilly and Company, et al.	2:23-cv-04384
Jackson County, Missouri v. Eli Lilly and Company, et al.	2:23-cv-04531
City of Cleveland, Ohio v. Eli Lilly and Company, et al.	2:23-cv-04544
County of Albany, New York v. Eli Lilly and Company, et al.	2:23-cv-07042
Lake County, Illinois v. Eli Lilly and Company, et al.	2:23-cv-08487
Bossier Parish v. Eli Lilly and Company, et al.	2:23-cv-10910
Steuben County, New York v. Eli Lilly and Company, et al.	2:23-cv-18249
Cortland County, New York v. Eli Lilly and Company, et al.	2:23-cv-18314
Livingston County, New York v. Eli Lilly and Company, et al.	2:23-cv-18351
Schenectady County, New York v. Eli Lilly and Company, et al.	2:23-cv-20375
Cuyahoga County v. Eli Lilly and Company, et al.	2:23-cv-21082
King County v. Eli Lilly and Company, et al.	2:23-cv-21178
Pinellas County, Florida v. Eli Lilly and Company, et al.	2:23-cv-21381
City of Alexandria, Virginia v. Eli Lilly and Company, et al.	2:23-cv-22769
County Board of Arlington County, Virginia v. Eli Lilly and Company, et al.	2:23-cv-22776
Spokane County v. Eli Lilly and Company, et al.	2:23-cv-22847
Board of County Commissioners of Washington County, Maryland v. Eli Lilly and Company, et al.	2:23-cv-22917
Henrico County, Virginia v. Eli Lilly and Company, et al.	2:23-cv-23042
The Board of County Commissioners of St. Mary's County, Maryland v. Eli Lilly and Company, et al.	2:23-cv-23090

Case Name	Case No.
Anne Arundel County, Maryland v. Eli Lilly and Company, et al.	2:24-cv-00384
County of Wayne, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00523
City of Roanoke, Virginia et al. v. Eli Lilly and Company, et al.	2:24-cv-00559
Erie County, New York v. Eli Lilly and Company, et al.	2:24-cv-00632
Onondaga County, New York v. Eli Lilly and Company, et al.	2:24-cv-00646
Niagara County, New York v. Eli Lilly and Company, et al.	2:24-cv-00652
Broome County, New York v. Eli Lilly and Company, et al.	2:24-cv-00692
Oneida County, New York v. Eli Lilly and Company, et al.	2:24-cv-00694
Washtenaw County, Michigan, et al. v. Eli Lilly and Company, et al.	2:24-cv-00717
Macomb County, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00719
Monroe County, Michigan v. Eli Lilly and Company, et al.	2:24-cv-00720
LDG Medical Services Group, L.L.C., et al. v. Eli Lilly and Company, et al.	2:24-cv-00725
Warren County, New York v. Eli Lilly and Company, et al.	2:24-cv-00992
St. Louis County, Missouri v. Eli Lilly and Company, et al.	2:24-cv-04615
Mayor & City Council of Baltimore v. Eli Lilly & Company, et al.	2:24-cv-05099
City of Lorain, Ohio v. Eli Lilly and Company, et al.	2:24-cv-05002
Commonwealth of Pa. ex rel. Lawrence S. Krasner v. Eli Lilly and Company, et al.	2:24-cv-05391
Clark County v. Eli Lilly and Co., et al.	2:24-cv-06568
Heat and Frost Insulators Local No. 33 Health Fund v. Eli Lilly and Company, et al.	2:24-cv-06233
Int'l Union of Operating Engineers Local No. 478 Health Fund v. Eli Lilly and Company, et al.	2:24-cv-06303
Int'l Union of Operating Engineers Welfare Fund of Eastern Pa. v. Eli Lilly and Company, et al.	2:24-cv-06312

Case Name	Case No.
Board of Supervisors of Accomack County v. Eli Lilly and Company, et al.	2:24-cv-06329
City of Portsmouth, Virginia v. Eli Lilly and Company, et al.	2:24-cv-06331
Hamblen County, TN v. v. Eli Lilly and Company, et al.	2:24-cv-06456
Greene County, Tennessee v. Eli Lilly and Company, et al.	2:24-cv-06919
City of Marietta, Georgia v. Eli Lilly and Company, et al.	2:24-cv-06949
Johnson County, Tennessee v. Eli Lilly and Company, et al.	2:24-cv-06973
Cocke County, Tennessee v. Eli Lilly and Company, et al.	2:24-cv-06980
Kentucky Laborers District Council Health and Welfare Fund v. Eli Lilly and Company, et al.	2:24-cv-07091
Iron Workers' Locals No. 15 and 424 Extended Benefit Fund v. Eli Lilly and Company, et al.	2:24-cv-07720
Ulster County v. Eli Lilly and Company, et al.	2:24-cv-07854
Virginia Beach, Virginia v. Eli Lilly and Company, et al.	2:24-cv-07885
Parish Government Risk Management Agency v. Eli Lilly and Company, et al.	2:24-cv-08097
County of Whitfield, Georgia v. Eli Lilly and Company, et al.	2:24-cv-08235
City of Hialeah, Florida v. Eli Lilly and Company, et al.	2:24-cv-08327